



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460**

**OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES**

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Memorandum

From: Kurt Pluntke, M.S..
Environmental Field Branch
Field and External Affairs Division

To: Arthur-Jean Williams, Chief
Environmental Field Branch
Field and External Affairs Division

Subject: Effects Determination for Pendimethalin for Certain Pacific Anadromous Salmonids

I reviewed data and other information for Pendimethalin, a registered herbicide named by the Washington Toxics Coalition (WTC) and included in the court order for 'effects determinations' and potential consultation with the National Marine Fisheries Service. Pendimethalin is registered nationally for use on a wide variety of agricultural crops; commercial turf and ornamental operations; home gardens and ornamentals and other non-agriculture uses. The Environmental Fate and Effects Division (EFED) has completed an environmental risk assessment for a "Reregistration Eligibility Decision (RED) Pendimethalin" issued in June, 1997. The assessment concludes that high acute risk to fish is unlikely except at maximum application rates. There is marginal potential for chronic risk to fish and minimal acute risk to aquatic invertebrates.

I have adapted the more general findings of the EFED assessment to develop an analysis of the potential for effects on endangered and threatened Pacific salmon and steelhead Evolutionary Significant Units (ESUs) from current uses in California and the Pacific Northwest.

My analysis addresses changes in uses and rates that have been put on most labels since the RED was developed. EFED has also developed new EECs for selected use sites that correspond with these changes. OPP's levels of concern are marginally exceeded for direct acute risks from a single use (corn, aerially applied) to endangered fish. Levels of concern are not exceeded for risk to aquatic vascular plants that may serve as cover for fish.

Based upon the available information, I determined that some use of Pendimethalin on crops and certain non-crop sites may affect but is not likely to adversely affect four ESUs, and will have no effect on 22 ESUs. Potential effects are limited and any that occur are likely only in breeding and rearing areas. No effects are expected from home and garden use or for use on golf course tees and greens, and no chronic effects are expected for any use.

attachment:

Pendimethalin: Analysis of Risks to Endangered and Threatened Salmon and Steelhead
(with attachments)